

**Remarks**

Claims 1-28 have been canceled. Claims 29-50 are presently pending in the application. In the prior action, claims 29-50 were rejected under 35 U.S.C. 103 (a) as being unpatentable over United States Patent No. 6,070,671 to Cumming et al. ("Cumming").

**In the Drawings:**

The Examiner has objected to the drawings for failing to depict "the first casing expanded" as recited in claim 24. Claim 24 has been canceled. Accordingly, Applicant respectfully submits that the Examiner's objection to the drawings has been mooted by amendment.

**Rejections under 35 U.S.C. 103(a):**

Claims 29-41 are apparatus claims and claims 42-50 are method claims. As amended, independent claims 29 and 42 read as follows:

29. A monobore ~~wellbore~~ system of adjoining wellbores comprising:

a first casing positioned within a first wellbore extending from the surface, the first casing having a first inner diameter and a lap region; and

a second casing positioned within a second wellbore extending from the surface that adjoins the first wellbore such that a downhole end of the second casing is positioned within the lap region of the first casing, the second casing having a second inner diameter that is substantially the same as the first inner diameter, the downhole end of the second casing being coupled to the lap region of the first casing when the first casing is positioned within the first wellbore and the second casing is positioned within the second wellbore.

42. A method of forming a connection between adjoining wellbores comprising the steps of:

installing a first casing within a first wellbore extending from the surface, the first casing having a first inner diameter and a lap region;

installing a second casing within a second wellbore extending from the surface that adjoins the first wellbore such that a downhole end of the second casing is positioned within the lap region of the first casing, the second casing having a second inner diameter that is substantially the same as the first inner diameter; and

coupling the downhole end of the second casing to the lap region of the first casing downhole.

In the office action, the Examiner asserted that system claims 29-41 were obvious in light of Cumming. The Examiner explained his application of Cumming to independent claim 29 as follows:

[Cumming] discloses a monobore wellbore of adjoining wellbores comprising a: first casing 17 positioned within a first wellbore, the first casing having a first inner diameter and a lap region; and a second casing 21 positioned within a second wellbore that adjoins the first wellbore such that a downhole end of the second casing is positioned within the lap region, figure 2, of the first casing, the second casing having a second inner diameter that is substantially the same as the first inner diameter, the downhole end of the second casing being coupled to the first casing when the first casing is positioned within the first wellbore and the second casing is positioned within the second wellbore, figure 4;

The Examiner further asserted that method claims 42-50 were obvious in light of Cumming. The Examiner explained his application of Cumming to independent claim 42 as follows:

[Cumming] further discloses a method of forming a connection between adjoining wellbores, figure 4, comprising the steps of: installing a first casing 17 within a first wellbore, the first casing having a first inner diameter and a lap region; installing a second casing 21 within a second wellbore that adjoins the first

wellbore such that a downhole end of the second casing is positioned within the lap region of the first casing, the second casing having a second inner diameter that is substantially the same as the first inner diameter; and coupling the downhole end of the second casing to the first casing downhole;

The Examiner has conceded that Cumming does not disclose the branch wellbore casing being connected at a lap region, the first casing being expanded to the first inner diameter when the first casing is positioned within the multilateral wellbore or the first and second casings being branch wellbore casings of multilateral wellbores. The Examiner has asserted, however, that these limitations are obvious in light of Cumming.

Applicant respectfully submits that the pending claims are not obvious in light of Cumming. Cumming discloses a method for creating zonal isolation between the exterior and interior of an uncased section of an underground well system which is located adjacent to a well section in which a well casing is present. The method includes inserting an expandable tubular through the existing well casing into an uncased section, such as a lateral branch, of the underground well system and subsequently expanding the expandable tubular such that the one end is pressed towards the wall of the uncased section of the well system and the outer surface of the other end is pressed against the inner surface of the well casing thereby creating an interference fit capable of achieving a shear bond and a hydraulic seal between the surrounding

surfaces. Figures 2 and 4 of Cumming appear as shown below and to the right. Figure 2 is described as follows:

Referring now to FIG. 2 there is shown a borehole in which a well casing 10 has been installed and cemented in place by an annular body of cement 11. An expandable tubular 12 has been installed and expanded by a ceramic expansion cone in the same manner as described with reference to FIG. 1. However the lower end 10A of the well casing 10 has been expanded to a larger internal diameter than the rest of the casing. The tubular 12 is expanded against the lower end 10A of the well casing 10, thereby creating an interference fit between the mating surfaces of the tubular 12 and well casing 10. The lower end 10A of the well casing may be expanded together with the tubular 12 by the expansion cone while the annular body of cement 11 is still in a liquid state. As a result of the expansion a strong bond will be created between the cement and the tubular, the casing and the surrounding formation 13. The enlarged diameter of the lower part 10 of the casing 10 results in a well having a uniform internal diameter throughout the length of the well.

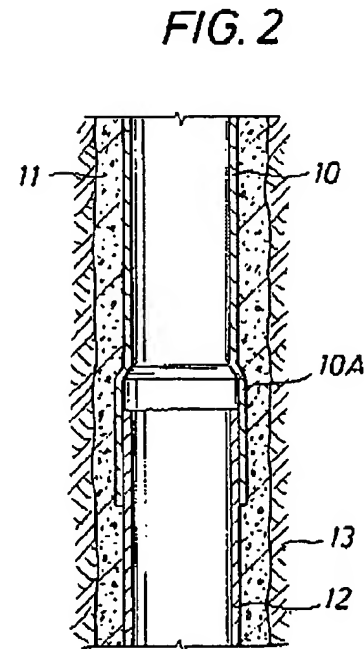


Figure 4 of Cumming is described as follows:

FIG. 4 shows how an expandable tubular 21 is inserted into the lateral borehole 18 from the mother well 15 such that the upper end of the tubular fits coaxially inside the well casing 16 of the mother well 15. The tubular 20 is expanded by moving an expansion mandrel 22 axially therethrough by pumping,

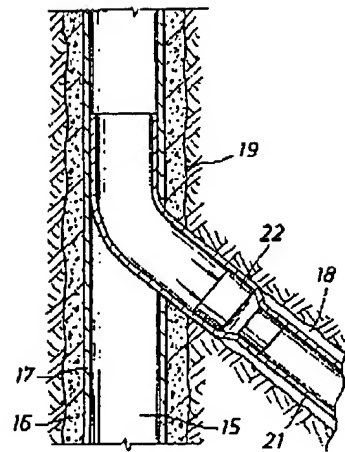
pushing and/or pulling. The properties of the tubular 21 and mandrel 22 are the same as those described with reference to FIG. 1. As a result of the expansion process outer surface the upper end of the expanded tubular 21 is pressed against the inner surface of the casing 16 thereby creating an interference fit capable of creating a shear bond and a hydraulic seal between the mating surfaces.

The expanding tubular 21 is also pressed against the inner surface of the lateral borehole and the rims of the opening 20 in the well casing 16 and cement body 17 thereby creating a hydraulic bond between the expanded tubular 21 and the rims of the opening 20 and the inner surface of the lateral borehole 18.

In this manner the expanded tubular 21, and well casing 16 provide an adequate zonal isolation between the interior and exterior in the region of the junction between the lateral borehole 18 and the mother well 15 and robust anchoring of the tubular 21 to the well casing 16 is provided.

In light of the above, Applicant respectfully submits that the pending claims are not obvious in light of Cumming or any of the remaining cited art. The Examiner has identified no teaching, within any of the cited art, of either a monobore wellbore system or a method for adjoining adjacent wellbores as recited in the present claims wherein each of two wellbores in the system extends from the surface. Accordingly, Applicant respectfully requests

FIG. 4



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that the Examiner withdraw the outstanding rejections and allow the pending claims to issue.

**Fee Statement**

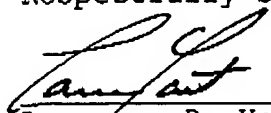
Applicant believes no fees are due in conjunction with the filing of this Response. If fees are due or if overpayment has been made, however, please debit or credit our deposit account, Account No. 03-1130.

**Conclusion**

In light of the foregoing amendments and remarks, Applicant respectfully requests that the Examiner withdraw the rejection of the pending claims under 35 U.S.C. 103(a). The Examiner is respectfully requested to call the undersigned for any reason which would advance this case to issuance.

Dated this 20th day of December, 2005.

Respectfully Submitted,



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